

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

MONICA D. JORDAN,

Plaintiff,

vs.

DOLGENCORP, LLC,

Defendant.

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NO. 1:12-cv-01696-JEC

AGREED STIPULATION

It is hereby agreed and stipulated by Plaintiff Monica D. Jordan and Dolgencorp, LLC (“Defendant” or “Dollar General”) (collectively referred to herein as “Parties”), that the Parties have reached a settlement of Plaintiff’s claims, including Plaintiff’s claims under the Fair Labor Standards Act (“FLSA”). The Parties stipulate that the settlement reflects reasonable compromise concerning *bona fide* disputes between them with respect to liability and the amount of same under the FLSA. For example, in this case, the number of hours worked by Plaintiff is disputed. The method of calculating overtime, and any overtime rate of pay is disputed. Moreover, Defendant disputes that Plaintiff is entitled to overtime under the FLSA because Defendant contends that Plaintiff was properly classified as exempt from overtime. This settlement was negotiated at arm’s length by experienced counsel who protected the rights of the Parties. The Parties further stipulate that the amounts and terms of the settlement is fair, just, and adequate compensation to settle Plaintiff’s claims.

Respectfully submitted this the 21st day of March, 2013.

<p><u>/s/ James E. Radford, Jr.</u> James E. Radford, Jr. GA State Bar No. 108007 James Radford, LLC 150 E. Ponce de Leon Avenue, Suite 260 Decatur, GA 30030 Tel: 678-369-3609 james@jamesradford.com</p> <p>ATTORNEYS FOR PLAINTIFF</p>	<p><u>/s/ Melissa M. Hensley</u> Joel S. Allen TX State Bar No. 00795609 (Admitted <i>Pro Hac Vice</i>) Melissa M. Hensley TX State Bar No. 00792578 (Admitted <i>Pro Hac Vice</i>) MORGAN, LEWIS & BOCKIUS LLP 1717 Main Street, Suite 3200 Dallas, TX 75201.7347 Tel: 214-466-4000 Fax: 214-466-4001 joal.allen@morganlewis.com melissa.hensley@morganlewis.com</p> <p>Anderson B. Scott Georgia Bar No. 631940 Edward N. Boehm, Jr. Georgia Bar No. 183411 FISHER & PHILLIPS LLP 1075 Peachtree Street, NE, Suite 3500 Atlanta, GA 30309 Tel: 404-231-1400 Fax: 404-240-4249 ascott@laborlawyers.com tboehm@laborlawyers.com</p> <p>ATTORNEYS FOR DEFENDANT DOLGENCORP, LLC</p>
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